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STATE OF INDIANA) IN THE ST. JOSEPH SUPERIOR/CIRCUIT COURT
) SS:
 ST. JOSEPH COUNTY) CAUSE NO. 71_0_-1310-~~07~~ ^{PL} 00199

MARY O. MILAN
 Plaintiff,

vs.

TRW AUTOMOTIVE U.S. LLC
 And TRW AUTOMOTIVE, INC.
 Defendants

ST. JOSEPH COUNTY
 CLERK

2013 OCT 11 P 3:33

CIRCUIT COURT

COMPLAINT

Comes now the Plaintiff, Mary O. Milan ("Milan"), by counsel, Thomas M. Walz of Hahn|Walz, 509 W. Washington St., South Bend, Indiana 46601, and for her cause of action against TRW Automotive U.S. LLC ("TRW, LLC") and TRW Automotive, Inc. ("TRW, Inc.") alleges and says:

1. That Milan is an individual residing in Lowell, Michigan;
2. That Milan was previously married to the late Gerard John Milan, who died on November 12, 2012;
3. That TRW, Inc. is a Delaware Corporation with its principal place of business in Livonia, Michigan;
4. That TRW, LLC is a Delaware Limited Liability Company with its principal place of business in Livonia, Michigan;
5. That TRW, among other things, is a global supplier of automotive systems, modules, and components;
6. That Gerard John Milan was an employee of Wolverine Brass, which company was purchased by TRW, and as such was a participant in the Wolverine Brass Hourly

7. That Milan received a letter from TRW dated September 5, 2012, which letter is attached hereto as Exhibit "A", wherein it was stated, in part, that a retiree or surviving beneficiary may elect to receive the remaining value of his or her pension benefit as a lump sum payment, and that the offer would end on November 8, 2012;
8. That in reliance on this limited offer, Milan provided TRW, on October 26, 2012, with all necessary information required by TRW to elect to receive the remaining value of Gerard John Milan's pension benefit as a lump sum;
9. That Gerard John Milan passed away on November 12, 2012 in Kent County, Michigan;
10. That subsequent to Gerard John Milan's passing, and subsequent to Milan's timely election to TRW to receive Gerard John Milan's remaining pension benefit as a lump sum payment, TRW refused to make a lump sum payment of Gerard John Milan's remaining pension benefit;
11. That TRW, by its refusal to honor the timely election made by Milan in reliance upon its initial offer, has breached the agreement that was formed upon Milan's timely election to receive Gerard John Milan's pension benefits in one lump sum payment;
12. That as a result of TRW's breach, Milan has been damaged in an amount to be determined at a trial in this cause.

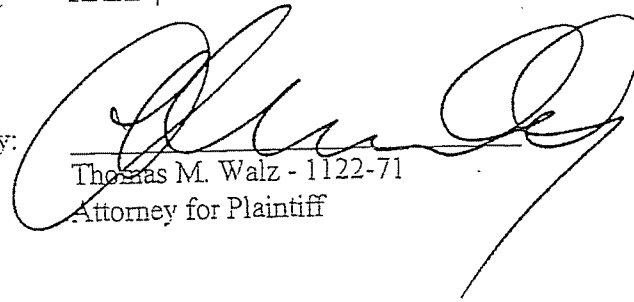
WHEREFORE, Mary O. Milan prays for judgment against TRW Automotive U.S. LLC, in an amount to be determined at a trial of this cause, prejudgment interest, post-judgment interest, and for all other just and proper relief in the premises.

DEMAND FOR TRIAL BY JURY

That Plaintiff, Mary O. Milan, hereby demands a jury trial in this cause.

HAHN|WALZ

by:

A large, stylized handwritten signature in black ink, likely belonging to Thomas M. Walz, is written over a horizontal line.

Thomas M. Walz - 1122-71
Attorney for Plaintiff